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January 5, 2005

**VIA HAND DELIVERY**

Honorable Pat Miller, Chairman  
c/o Sharla Dillon, Docket & Records Manager  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

**RE: *Petition of Frontier Communications, Inc. For a Declaratory Ruling***  
***TRA Docket No. 04-00379***

Dear Chairman Miller:

Enclosed please find one (1) original and thirteen (13) copies of North Central Telephone Cooperative, Inc.'s Petition for Leave to Intervene. We have also enclosed one copy of the documents to be file stamped for our records. Also enclosed is a check in the amount of \$25.00 for the filing fee. If you have any questions or need additional information, please let me know

Very truly yours,

  
Melvin J. Malone

MJM cgb

Enclosures

cc Guilford F Thornton, Jr.  
H. LaDon Baltimore  
F Thomas Rowland

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

<b>PETITION OF FRONTIER</b>	<b>)</b>	<b>DOCKET NO. 04-00379</b>
<b>COMMUNICATIONS, INC. FOR A</b>	<b>)</b>	
<b>DECLARATORY RULING</b>	<b>)</b>	

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**PETITION FOR LEAVE TO INTERVENE OF  
NORTH CENTRAL TELEPHONE COOPERATIVE, INC.**

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North Central Telephone Cooperative, Inc. ("North Central" or "Petitioner"), by and through its undersigned counsel, hereby seeks leave to intervene in the above-captioned proceeding pursuant to Tenn. Code Ann. § 4-5-310. In support of this petition, Petitioner states as follows:

1. Petitioner is a Tennessee telephone cooperative authorized and organized under state law, specifically Tenn. Code Ann. §§ 65-29-101 *et seq.*, to operate and to provide services in the State of Tennessee and maintains its offices at P.O. Box 70, Highway 52 By-Pass, Lafayette, Tennessee 37083.

2. Petitioner provides a full range of telecommunications and broadband services in five (5) Tennessee counties, servicing nine (9) exchanges.

3. In its Petition, Frontier Communications, Inc. ("Frontier") alleges that the Tennessee Regulatory Authority ("Authority" or "TRA") has granted Frontier a statewide certificate of convenience and necessity as a competing telecommunications provider and that

there is no prohibition on Frontier operating within the boundaries of a Tennessee telephone cooperative.

4. Further, Frontier alleges in its Petition that Ben Lomand Rural Telephone Co-op, Inc. (“Ben Lomand”) has taken the position that Frontier is “statutorily prohibited” from competing in Ben Lomand’s territory.

5. As Petitioner is a Tennessee telephone cooperative, the subject of this proceeding may directly affect Petitioner’s operations in the State of Tennessee.

6 Petitioner’s legal rights, duties, privileges, immunities or other legal interests may be determined in this proceeding.

7. Because of its direct interest in this proceeding, Petitioner respectfully seeks to intervene in this matter

8 The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the requested intervention

9. Should the requested intervention be granted, all notices, pleadings, orders, documents and the like in this proceeding should be provided to:

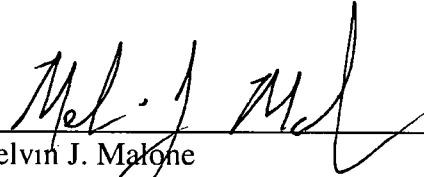
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and

F. Thomas Rowland, President/CEO  
NORTH CENTRAL TELEPHONE COOPERATIVE, INC  
P.O. Box 70  
Highway 52 By-Pass  
Lafayette, Tennessee 37083  
Tel. (615) 666-2151  
Fax (615) 666-2085  
trowland@nctc.com

Based on the foregoing considerations, Petitioner requests the Authority to grant this request for intervention.

Respectfully submitted,



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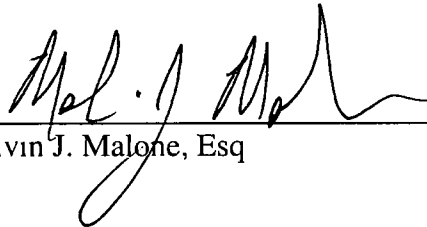
Attorneys for North Central Telephone  
Cooperative, Inc.

### Certificate of Service

I hereby certify that a true and correct copy has been forwarded via U.S. Mail to the following on this the 5<sup>th</sup> day of January, 2005.

Guilford F. Thornton, Jr.  
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Melvin J. Malone, Esq